

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THE TRUSTEES OF PRINCETON  
UNIVERSITY,

Plaintiff,

v.

TOD WILLIAMS BILLIE TSIEN  
ARCHITECTS, LLP; JACOBS  
ARCHITECTS/ENGINEERS, INC.;  
and JACOBS CONSULTANCY INC.,

Defendants.

---

TOD WILLIAMS BILLIE TSIEN  
ARCHITECTS, LLP,

Third-Party Plaintiff,

v.

ARUP USA, INC. and F.J. SCIAME  
CONSTRUCTION COMPANY, INC.

Third-Party  
Defendants.

---

I, Emily D. Anderson, declare as follows:

1. I am an attorney admitted to practice in the State of New Jersey and am an Associate at Sheppard, Mullin, Richter and Hampton LLP, counsel to Third-Party Defendant F.J. Sciame Construction Company, Inc. (“Sciame”). I respectfully submit this Declaration in opposition to Defendant Jacobs Architects/Engineers, Inc.

and Jacobs Consultancy, Inc.’s (“Jacobs Defendants”) Motion to Supplement and/or Amend the Answer, Affirmative Defenses, Counterclaim and Cross-Claim (“Motion to Amend”) (Dkt. 42).

2. This declaration is based upon my review of the relevant pleadings and records in this matter, as well as my personal knowledge.

3. This litigation arises out of a construction project for the design and construction of the Andlinger Center for Energy and the Environment, a new state-of-the-art building for Plaintiff The Trustees of Princeton University’s (“Princeton”) (the “Project”).

4. Princeton and Sciame entered into a contract whereby Sciame would provide construction management services for the Project.

5. On November 29, 2016, Princeton and Sciame executed a settlement agreement, agreeing to release all claims against each other related to the Project.

6. On December 10, 2019, Princeton filed a Complaint against the Jacobs Defendants, among others. A copy of the Complaint is annexed hereto as Exhibit A (Dkt. No. 1).

7. On June 12, 2020, the Jacobs Defendants filed their Motion to Amend, which included a copy of their proposed Amended and Supplemental Answer,

Affirmative Defenses, Counterclaim, and Cross-Claims (“Proposed Amended Answer”). A copy of the Proposed Amended Answer is annexed hereto as Exhibit B (Dkt. No. 42-1).

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 22, 2020 at Yonkers, New York.

s/ Emily D. Anderson  
Emily D. Anderson